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Attorneys for Defendant

INTERNATIONAL BUSINESS

MACHINES CORPORATION

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

MAY 12 2008

at 4 o'clock and 30 min. P.M.
SUE BEITIA, CLERK

LODGED

MAY 09 2008 3:50 PM

CLERK, U.S. DISTRICT COURT
DISTRICT OF HAWAII

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

RSI CORP., dba RESPONSIVE SYSTEMS
COMPANY, a New Jersey corporation,

Plaintiff,

vs.

INTERNATIONAL BUSINESS MACHINES
CORPORATION; and DOE DEFENDANTS
1-20,

Defendants.

CIVIL NO. CV 08-00066 JMS/BMK

EX PARTE APPLICATION FOR
ADMISSION *PRO HAC VICE* OF
SCOTT L. WATSON; DECLARATION
OF SHIRLEY M. KAWAMURA;
DECLARATION OF SCOTT L.
WATSON; ORDER GRANTING *EX*
PARTE APPLICATION FOR
ADMISSION *PRO HAC VICE* OF
SCOTT L. WATSON; CERTIFICATE
OF SERVICE

Assigned to the Hon. J. Michael Seabright
No Trial Date Has Been Set

EX PARTE APPLICATION FOR ADMISSION PRO HAC VICE OF SCOTT L. WATSON

Pursuant to Local Rule ("LR") 83.1(e) of the Local Rules of Practice for the United States District Court for the District of Hawaii, Defendant International Business Machines Corporation ("IBM" or "Defendant") hereby moves this Court *ex parte* for an Order permitting Scott L. Watson, Esq. of the law firm of Quinn Emanuel Urquhart Oliver & Hedges, LLP to appear and be associated as co-counsel with Kawashima Lorusso & Harada, LLP on behalf of IBM before this Court.


This application is made in accordance with LR 83.1(e) and is based on the Declarations of Shirley M. Kawamura, Esq. and Scott L. Watson, Esq. attached hereto.

DATED: Honolulu, Hawaii

~~April 8~~, 2008
may

KAWASHIMA LORUSSO & HARADA, LLP

By: _____


Shirley M. Kawamura
Attorney for Defendant
INTERNATIONAL BUSINESS
MACHINES CORPORATION

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

RSI CORP., dba RESPONSIVE SYSTEMS
COMPANY, a New Jersey corporation,

Plaintiff,

vs.

INTERNATIONAL BUSINESS MACHINES
CORPORATION; and DOE DEFENDANTS
1-20,

Defendants.

CIVIL NO. CV 08-00066 JMS/BMK

DECLARATION OF SHIRLEY M.
KAWAMURA

DECLARATION OF SHIRLEY M. KAWAMURA

I, SHIRLEY M. KAWAMURA, declare as follows:

1. I am an attorney licensed to practice law before all the state and federal courts in the State of Hawaii and am one of the attorneys for International Business Machines Corporation ("IBM") in the above-entitled action.

2. This Declaration is made in lieu of an affidavit pursuant to Local Rule 7.6, Rules of the United States District Court for the District of Hawaii, as amended.

3. I make this Declaration in support of the foregoing *ex parte* application for admission and association of Scott L. Watson, Esq. with the firm of Kawashima Lorusso & Harada, LLP.

4. Scott L. Watson, Esq. is licensed to practice law in California and is fully qualified to represent IBM in the above-entitled action.

5. Mr. Watson and his firm, Quinn Emanuel Urquhart Oliver & Hedges, LLP, have specially appeared as counsel for IBM in various matters around the country, and possess a detailed knowledge of IBM's business affairs, operations, and history.

6. I believe the attorney-client relationship and familiarity that has developed between Scott L. Watson, Quinn Emanuel Urquhart Oliver & Hedges, LLP and IBM will substantially facilitate representation of IBM in this litigation.

7. On behalf of the law firm of Kawashima Lorusso & Harada, LLP, I consent and recommend that Scott L. Watson, Esq. be permitted to appear and be associated as co-counsel with the law firm of Kawashima Lorusso & Harada, LLP in the presentation of matters herein before this Court.

I declare under penalty of law that the foregoing is true and correct to the best of my knowledge and belief.

DATED: Honolulu, Hawaii, MAY 09 2008


SHIRLEY M. KAWAMURA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

RSI CORP., dba RESPONSIVE SYSTEMS
COMPANY, a New Jersey corporation,

Plaintiff,

vs.

INTERNATIONAL BUSINESS MACHINES
CORPORATION; and DOE DEFENDANTS
1-20,

Defendants.

CIVIL NO. CV 08-00066 JMS/BMK

DECLARATION OF SCOTT L.
WATSON

DECLARATION OF SCOTT L. WATSON

I, SCOTT L. WATSON, declare as follows:

1. I make this Declaration pursuant to Local Rule 7.6, Rules of the United States District Court for the District of Hawaii, as amended, and in support of my application to appear *pro hac vice* in the above-captioned action.

2. I am actively licensed by the State of California since 2002, and am currently a partner at the firm of Quinn Emanuel Urquhart Oliver & Hedges, LLP, located at 865 South Figueroa Street, 10th Floor, Los Angeles, California 90017.

3. I do not reside in Hawaii, nor am I regularly employed in Hawaii; I am also not regularly engaged in business, professional, or law-related activities in Hawaii.

4. I am a resident of Los Angeles, California; my address is 9018 Beverlywood Street, Los Angeles, California 90034.

5. I am a member in good standing of the State Bar of California, and am licensed to practice before all courts, including the highest courts, of that state.

6. I have never been the subject of any suspension, disbarment or other disciplinary sanctions by any court in any jurisdiction.

7. No disciplinary charges are pending against me.

8. In the year preceding the present application, I have not made any *pro hac vice* application in this Court.

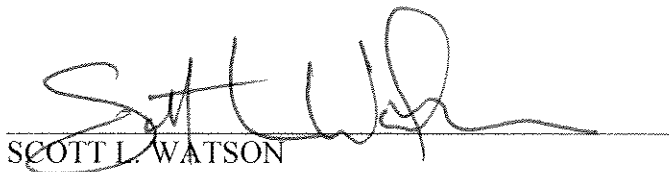
9. Defendant IBM has requested that I represent them in association with James Kawashima, Esq., Shirley M. Kawamura, Esq., and the law firm of Kawashima Lorusso & Harada, LLP, in the above-captioned litigation.

10. Any appearance I make in this action on behalf of IBM will be in association with James Kawashima, Esq., Shirley M. Kawamura, Esq., and the law firm of Kawashima Lorusso & Harada, LLP.

11. If admitted, I will abide by all applicable rules and procedures of the State of Hawaii and the U.S. District Court for the District of Hawaii as well as any other orders of this Court.

I declare under penalty of law that the foregoing is true and correct to the best of my knowledge and belief.

DATED: Los Angeles, California, April 23, 2008


SCOTT L. WATSON

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

RSI CORP., dba RESPONSIVE SYSTEMS
COMPANY, a New Jersey corporation,

Plaintiff,

vs.

INTERNATIONAL BUSINESS MACHINES
CORPORATION; and DOE DEFENDANTS
1-20,

Defendants.

CIVIL NO. CV 08-00066 JMS/BMK

ORDER GRANTING *EX PARTE*
APPLICATION FOR ADMISSION *PRO*
HAC VICE OF SCOTT L. WATSON

Assigned to the Hon. J. Michael Seabright
No Trial Date Has Been Set

ORDER GRANTING *EX PARTE* APPLICATION FOR
ADMISSION *PRO HAC VICE* OF SCOTT L. WATSON

Upon due consideration of Defendant International Business Machines Corporation's
("IBM") *Ex Parte* Application for Admission *Pro Hac Vice* of Scott L. Watson, the Declarations
of Shirley M. Kawamura, Esq. and Scott L. Watson, Esq., and finding good cause therefor,

IT IS HEREBY ORDERED that the Ex Parte Motion is GRANTED and that Scott L.
Watson, Esq. is admitted *Pro Hac Vice* in this matter as co-counsel with the law firm of
Kawashima Lorusso & Harada, LLP.

DATED: Honolulu, Hawaii, 5.12.2008


JUDGE OF THE ABOVE-ENTITLED COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

RSI CORP., dba RESPONSIVE SYSTEMS
COMPANY, a New Jersey corporation,

Plaintiff,

vs.

INTERNATIONAL BUSINESS MACHINES
CORPORATION; and DOE DEFENDANTS
1-20,

Defendants.

CIVIL NO. CV 08-00066 JMS/BMK

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was duly served on the following by
depositing same in the United States Mail, postage prepaid, addressed to the following last
known address:

ROBERT D. TRIANTOS
EDMUND W.K. HAITSUKA
CARLSMITH BALL LLP
75-1000 Henry Street, Suite 209
P.O. Box 1720
Kailua-Kona, HI 96745-1720
Attorney for Plaintiff
RSI Corp.

DATED: Honolulu, Hawaii, _____

MAY 09 2008



SHIRLEY M. KAWAMURA
Attorneys for Defendant
International Business Machines Corporation